

No.	Section	General Comment	Response
8	Worksheet 11, Pages 17 to 18	In the "What will the data be used for" section, please state explicitly that neither background nor reference data results will be subtracted from the concentrations detected in the LPRSA, and that they will not be used to lower either the human health or ecological risks calculated for the LPRSA.	The CPG intends to follow relevant USEPA guidance (e.g., USEPA 2002, USEPA 1994) on use of background and reference data in the baseline risk assessment. In <i>Role of Background in the CERCLA Cleanup Program</i> (USEPA, 2002) it states, "the COPCs with high background concentrations should be discussed in the risk characterization, and if data are available, the contribution of background to site concentrations should be distinguished." This document further states "The Risk Characterization should include a discussion of elevated background concentrations of COPCs and their contribution to site risks." Therefore, consistent with USEPA guidance, the following sentence has been added to WS#11 under the "What will the data be used for" section: "Consistent with USEPA guidance the Risk Characterization, in addition to presenting LPRSA risks, will present a discussion of the contribution of background and reference concentrations to the site risks."